

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Caption in Compliance with D.N.J. LBR 9004-2(c)

WASSERMAN, JURISTA & STOLZ, P.C.
225 Millburn Avenue - Suite 207
P.O. Box 1029
Millburn, New Jersey 07041
Phone: (973) 467-2700
Fax: (973) 467-8126
Counsel to Debtor
DANIEL M. STOLZ, ESQ. (DS-1897)

In Re:

WALSH SECURITIES, INC.,

Debtor.

Case No.: 10-44845

Hon. Novalyn L. Winfield

Chapter: 11

**NOTICE OF MOTION TO AUTHORIZE SUBMISSION
OF RETENTION APPLICATION UNDER SEAL**

PLEASE TAKE NOTICE that on _____, 2010, at _____, or as soon thereafter as counsel may be heard, the undersigned attorneys for Walsh Securities, Inc., the Debtor in the within Chapter 11 proceeding, ("Debtor") will appear before the Honorable Novalyn L. Winfield, United States Bankruptcy Court, 50 Walnut Street, Newark, New Jersey 07102, and seek entry of an Order authorizing the Debtor to file an application for retention of special litigation counsel under seal and for a protective order regarding communications with special litigation counsel.

PLEASE TAKE FURTHER NOTICE that the undersigned will rely on the Application of Walsh Securities, Inc. submitted herewith. This motion does not involve complex questions of law, therefore no brief is required to be submitted pursuant to D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-1, responsive papers, if any, must be filed with the Clerk of the Bankruptcy Court, 50 Walnut Street, Newark,

New Jersey 07102, no later than seven (7) days prior to the initial return date of this motion. If no timely objection is filed and served, this motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a), and the relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-1(f), unless a party requests oral argument and states their intentions regarding oral argument in their moving papers, or the court otherwise directs, this motion shall be decided on the papers. **ORAL ARGUMENT IS WAIVED.**

WASSERMAN, JURISTA & STOLZ, P.C.
Attorneys for Walsh Securities, Inc., Debtor

/s/ Daniel M. Stolz
By: _____
DANIEL M. STOLZ

DATED: December 9, 2010.